

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GLORIA J. JACKSON	:	
6038 Chestnut Street	:	CIVIL ACTION
Philadelphia, PA 19139	:	
	:	
Plaintiff,	:	
v.	:	
DREAM HOME REMODELING, INC.	:	DOCKET NO.: <b>02-CV-4027</b>
d/b/a American Dream Remodeling	:	
420 Park Road, Suite 210	:	
Reading, PA	:	
	:	
12 Hull Street	:	
Sinking Springs, PA 19608	:	
and	:	
MILLENNIUM CAPITAL CORPORATION	:	
12 S. Hull Street	:	
Sinking Springs, PA 19608	:	
and	:	
HEATHER FRANCAVAGE	:	
139 Marion Lane	:	
Shillington, PA	:	
and	:	
CHELSEA SETTLEMENT SERVICES, INC	:	
5010 E. Trindle Road, Suite 200	:	
Mechanicsburg, PA 17050	:	
and	:	
JOSEPH SCHLAMOWITZ a/k/a	:	
JOSEPH BURGER	:	
2320 Penn Avenue	:	
West Lawn, PA	:	
and	:	
A.J. LEEMAN, A/K/A	:	
ALFRED GEORGE LEEMAN, IV	:	
420 Park Road, Suite 210	:	
Reading, PA	:	
and	:	
WOODIE ZIMMERMANN	:	
12 S. Hull Street	:	
Sinking Springs, PA 19608	:	
and	:	
FIRST UNION NATIONAL BANK	:	
OF DELAWARE	:	
920 King Street	:	
Wilmington, DE 19801	:	
Defendants.	:	
	:	

**MOTION FOR THE EXTENSION OF DISCOVERY DEADLINE**

1. The plaintiff, Gloria Jackson initiated this action against all defendants as a result of defendant's fraud, negligence, breach of fiduciary duty and violations of the Truth in Lending Act.

2. Defendants, Millennium Capital Corporation, Heather Francavage, individually, Joseph Burger a/k/a Schlamowitz, individually, Chelsea Settlement Services and First Union Bank of Delaware have all answered plaintiff's Complaint and are represented by counsel. The remaining defendants: Woodie Zimmerman, A.J. Leeman, Dream Home Remodeling, Inc. have not answered plaintiff's Complaint nor are represented by Counsel.

3. All represented parties met with the Honorable Cynthia M. Rufe on April 11, 2003 where the Court ordered that all discovery shall be completed on or before July 15, 2003. (See Civil Docket dated June 18, 2003, attached hereto as Exhibit A). The Court also ordered that the case be referred to Magistrate Judge Carol Moore Wells for a Settlement Conference on June 16, 2003. The Settlement Conference has been postponed by the Court and the parties are awaiting a new date.

4. The plaintiff noticed the depositions of all parties to take place as follows:

1. First Union National Bank - 6/26/03;
2. Millennium Capital Corporation - Heather Francavage and Joseph Schlamowitz a/k/a Joseph Burger - 6/24/03;
3. Chelsea Settlement Services - 6/23/03; and
4. A.J. Leeman a/k/a Alfred George Leeman IV - 6/25/03.

See attached letter noticing depositions attached hereto as Exhibit B.

5. At the request of defense counsel and based on defense counsel's representation to discuss serious settlement, plaintiff postponed these depositions to evaluate defendants

settlement offers.

6. Plaintiff has filed a separate, yet related state law claim against defendant A.J. Leeman, American Dream Home Remodeling, Inc., Legacy Bank and National Penn Bank for negligence and for conversion of funds related to the loan transaction that is the subject of the litigation before this Court.

7. Plaintiff has prepared and circulated a Stipulation wherein all counsel agree to join these two defendants and this claim with the instant cause of action in Federal Court.

8. The inclusion of this newly named defendant may also further the settlement negotiation process.

9. As a result of the foregoing posture of the case, all counsel have respectfully executed a Stipulation to extend the discovery deadlines of July 15, 2003 to September 15, 2003.

WHEREAS, in consideration of the foregoing, plaintiff respectfully requests on behalf of all counsel that the Court ratify the attached Stipulation approving the two (2) month extension of the discovery deadline.

Dated: July 17, 2003

FELDMAN & PINTO

By: \_\_\_\_\_

Rosemary Pinto, Esquire  
Attorney for Plaintiff  
1604 Locust Street, 2R  
Philadelphia, PA 19103  
(215) 546-2604

**CERTIFICATION OF SERVICE**

I hereby certify that I caused the below-described documents to be mailed via United States Mail to the person listed below on the date below.

DATE: July 17, 2003

DOCUMENT: **MOTION FOR THE EXTENSION OF DISCOVERY DEADLINE**

PERSON(s):

**SCOTT PAINTER, ESQUIRE**

Law Offices of Scott Painter  
906 Penn Avenue  
P.O. Box 6269  
Wyomissing, PA 19610  
Counsel for MILLENNIUM CAPITAL CORPORATION and  
HEATHER FRANCAVAGE

**PETER RUSSO, ESQUIRE**

Law Offices of Peter J. Russo  
3800 Market Street  
Camp Hill, PA 17011  
Counsel for CHELSEA SETTLEMENT SERVICES, INC.

**BARBARA MAJORS, ESQUIRE**

DERESPIDO & DOUGHER, P.C.  
1818 Market Street, Suite 3120  
Philadelphia, PA 19103  
Counsel for FIRST UNION NATIONAL BANK OF DELAWARE

**DREAM HOME REMODELING, INC. d/b/a AMERICAN DREAM REMODELING**

420 Park Road, Suite 210  
Reading, PA 19610-2900  
and  
12 Hull Street  
Sinking Springs, PA 19608

**JOSEPH SCHLAMOWITZ a/k/a**

**JOSEPH BURGER**  
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BY:

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